

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
DISTRICT OF NEW JERSEY
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Janet Francis,

Plaintiff,

Civil Action No. _____

-vs-

TD Bank, N.A

COMPLAINT

Defendant(s).

JURY DEMAND

PARTIES

**TD Bank, N.A.
1701 Route 70 East
Cherry Hill, NJ 08034
888-751-9000**

JURISDICTION

The grounds upon which the court's jurisdiction depends is a federal question, 28 U.S.C. 1441(a) and 28 U.S.C. 1367(a).

CAUSE OF ACTION

Quiet Title; violation of TILA; violation of Fair Foreclosure Act; Fraud; misapplied payments; breach of contract; wrongful foreclosure; negligent infliction of emotional distress; intentional infliction of emotional distress; incorrect interest rate at closing; incorrect taxes charged at closing; rescission; No notice of intent; Interstate Banking and Branching Efficiency Act of 1994, the investment company Act of 1940 and the Investment Advisers Act of 1940.

DEMAND

Declaratory and injunctive relief enforcing rescission of the mortgage, including a declaration that Plaintiff is not liable for any finance charge or other charge imposed in connection with the transaction; Declaratory and injunctive relief voiding the mortgage; awarding actual damages; awarding statutory damages; awarding attorney's fees and costs; closing costs and principle and interest paid totaling \$110,915.94 and granting such other relief as the court deems just and equitable.


JANET FRANCIS, PLAINTIFF